

Senior Planner
Fingal County Council
County Hall,
Swords,
Fingal

19th July 2011

Re: Draft Dardistown LAP

Dear Sir/Madam,

In response to your letter of 8th June 2011, the National Transport Authority (the Authority) has reviewed the amendments to draft Dardistown LAP, and would like to submit the following comments.

Section 31E(1) of the Dublin Transport Authority Act 2008 assigns the NTA¹ a role in the making of a Local Area Plan. Where a notice is received by the NTA under section 20(3)(a)(i), it shall prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in making, amending or revoking a local area plan. The report shall address, but shall not be limited to:

- (a) the transport investment priorities for the period of the local area plan,
- (b) the scope, if any, to maximise the performance of the transport system by effective land use planning,
- (c) recommendations regarding the optimal use, location, pattern and density of new development taking account of its transport strategy, and
- (d) recommendations on the matters to be addressed in the local area plan to ensure the effective integration of transport and land use planning.

The Authority is cognisant of the changes in Land Use zoning within the Local Area Plan (LAP) lands, and believes that these changes support the strategic development potential of Dardistown as an interchange point between Metro North and Metro West. The Authority in its previous submission on the Dardistown LAP supported the overall objectives of the draft Plan, in that it supports the consolidation of trip intensive development within a proposed rail-based public transport corridor, which in turn would contribute to the consolidation of development within the Metropolitan Area. In this regard, the Authority believes that there is no need to alter its previously stated position on the draft LAP. The Authority has attached a copy of the previous submission, which focuses on the

¹ As amended by section 30(C) of the Public Transport Regulation Act 2009

appropriate form of development, road proposals and car parking provision, and this should be read in conjunction with this letter.

In addition, the Authority has finalised the draft NTA Strategy which is currently with the Minister of Transport, Tourism and Sport for approval. In the draft Strategy, Dardistown is identified as the location for interchange between Metro North and Metro West in the strategy, which also contains a number of measures which should be taken into consideration in the preparation of LAPs. The Authority would suggest that the final draft of the Dardistown LAP should take account of the draft NTA Strategy.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Hugh Creegan', is written over a horizontal line.

Hugh Creegan

Director of Transport, Planning and Investment

Senior Executive Officer,
Planning Department,
Fingal County Council,
County Hall,
Swords,
Fingal,
County Dublin.

22nd September 2010

Re: Preparation of a Local Area Plan for lands at Dardistown, Ballystruan, Turnapin Great and Environs, Co. Dublin.

Dear Sir/ Madam,

The National Transport Authority (NTA) submits the following report on the issues to be considered in the preparation of a Local Area Plan for lands at Dardistown, Ballystruan, Turnapin Great and Environs, Co. Dublin. The comments focus on the following areas:

- What form of development would be appropriate for this area?
- Road Proposals.
- Car Parking Provision.

Section 31E(1) of the Dublin Transport Authority Act 2008 assigns the NTA¹ a role in the making of a Local Area Plan. Where a notice is received by the NTA under section 20(3)(a)(i), it shall prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in making, amending or revoking a local area plan. The report shall address, but shall not be limited to:

(a) the transport investment priorities for the period of the local area plan,

¹ As amended by section 30(C) of the Public Transport Regulation Act 2009

- (b) the scope, if any, to maximise the performance of the transport system by effective land use planning,
- (c) recommendations regarding the optimal use, location, pattern and density of new development taking account of its transport strategy, and
- (d) recommendations on the matters to be addressed in the local area plan to ensure the effective integration of transport and land use planning.

As the NTA is currently preparing a transport strategy, this submission will be based on existing national land use and transport policy that may have a bearing on the completed transport strategy. In this, the NTA places a critical emphasis on the need for a coherent approach to be taken in the prioritisation of investment in transport infrastructure in relation to RPG transport policies and objectives, as well as other policy areas such as settlement and economic development. The comments are based on the general objectives of the NTA as set out in Section 10 of the Dublin Transport Authority Act 2008 as amended, where the Authority is required to seek the following objectives -

- (a) the development of an integrated transport system which contributes to environmental sustainability and social cohesion and promotes economic progress,
- (b) the provision of a well-functioning, attractive, integrated and safe public transport system for all users,
- (c) improved access to the transport system and, in particular, to public passenger transport services by persons with disabilities,
- (d) increased use of the public transport system,
- (e) regulated competition in the provision of licensed public bus passenger services in the public interest,
- (f) the objectives set out in Section 9 of the Act of 2003 (Taxi Regulation),
- (g) increased recourse to cycling and walking as means of transport, and
- (h) value for money.

NTA Comment

What forms of development would be appropriate for this area?

Context

The Dardistown, Ballystruan, Turnapin Great & Environs Local Area Plan lands are located in an area which is potentially highly accessible by public transport from within the Metropolitan Area. The proposed Metro West and Metro North preferred alignments would join at a point within the LAP lands at the proposed Dardistown stop. The lands are also proximate to the Airport and to the Ballymun Interchange on the M50. Given these locational attributes, the LAP lands are considered to have

substantial development potential and would contribute to the consolidation of development within the Metropolitan Area.

Constraints

There are restrictions on the type of development that can be facilitated on the LAP lands associated with the:

- Outer Public Safety Zone² and the Inner Safety Zone²,
- excessive noise emitted from airport activities³ and, related to this, the location of much of the LAP lands in the Inner Noise Zone of the Airport,
- capacity on the Ballymun M50 Interchange,
- alignments of the Metro North and Metro West through the LAP lands, which will determine the configuration of development and permeability within the LAP area and,
- limitations to further expansion to the north (Airport) and to the south (M50).

Mixed Use Development

While rail-based public transport interchanges in the Metropolitan Area, as proposed for this area, have the potential to act as a focus for high density mixed use development, it is unlikely that this type of development would be suited to a location proximate to the Airport, given the restrictions on residential and institutional development in the Public Safety Zone and the Inner Noise Zone which affect most of the LAP lands.

Employment

In relation to the provision of employment intensive uses, generally, accessibility by public transport and location within the commercial core of higher order settlements in the GDA should be the primary considerations. Furthermore, the Regional Planning Guidelines (RPG) policy encourages *“mixed use settlements forms and sustainable centres, in which employment and residency are located in close proximity to each other and strategic multi-modal transport corridors”* (RPG, ER3, p76).

² The document “Public Safety Zones (PSZs) at Irelands three principal airports; Cork, Dublin, and Shannon” (Department of Transport, p7) states that within the PSZs the following land-use policy is proposed: allow existing developments to remain within outer PSZs, but prevent high density housing development, and the building of schools, hospitals and facilities attracting large numbers of people. The majority of the LAP lands are located in the Outer Public Safety Zone and a small proportion of LAP lands are located in the Inner Public Safety Zones.

³ See Objective EES1 and EE53 in the Draft Fingal Development Plan 2011-2017 (actively resist new provision for residential development and other noise sensitive uses within the Inner Noise Zone, restrict residential development in areas likely to be affected by levels of noise inappropriate to residential use.)

However, whilst there are significant constraints to development at this location, this must be reconciled with the intended accessibility of the LAP lands from within the Metropolitan Area. Dardistown is one of a limited number of proposed public transport interchange locations which, although not centrally located within Metropolitan Consolidation Towns, would demonstrate among the highest levels of public transport accessibility outside the City Centre⁶. With the exception of core town centre uses, such as retailing, under these circumstances such locations should be prioritised for whatever trip intensive employment development can be provided for. Taking into consideration these issues, the facilitation of employment based development should be subject to:

- the phasing of proposed developments being related to the commencement of Metro North and/or Metro West services,
- the examination of further public transport, walking and cycling measures, including a clearly defined hierarchy of networks for all modes, required to improve accessibility both from within the LAP lands and from the wider area, including adjacent areas of North Dublin City and Dublin Airport,
- the examination of the impact of additional development in this area on the M50 Ballymun Interchange, and
- the phasing of proposed developments that ensures that the area nearest the Dardistown Stop develops in sequence, focussed on the location of the public transport interchange, with the density gradient determined by proximity to the public transport interchange.

Road Proposals

It is indicated in the Draft Fingal Development Plan 2011-2017 that a new road (section of the "*East West Distributor Road: Stockhole Lane to Cherryhound*" Table TO4, p114) will traverse the northern section of the LAP lands. The inclusion of the foregoing and any other roads objectives included in the LAP will need to be clearly objective led and consistent with the policies set out in *Smarter Travel* (DoT) and the *NTA Draft Roads Policy Note*, as prepared for the NTA Transport Strategy for the GDA currently being prepared (see attached document).

Car Parking Provision

The supply and management of car parking is central to the management of transport demand. It has a critical influence on mode choice for trip generating uses (including offices), traffic management and the design of new developments and the allocation/design of space in urban areas. The control of car parking is therefore a key demand management measure to influence travel behaviour. For this reason,

⁶ In the event of the principal heavy rail projects and Metro Stops in Transport 21 being delivered.

the NTA would strongly recommend that car parking standards are set as maxima in the LAP.

As previously stated, employment development at this location can only be justified on the basis of its accessibility by public transport from within the Metropolitan Area. Therefore, the level at which maximum parking standards are set is of great importance. Where they exist, maximum standards are usually applied with varying degrees of constraint, on the basis of defined location factors such as centrality and public transport accessibility (taking into account proximity and levels of service, interconnectivity between services/networks). Related to these attributes, the application of parking standards would normally vary inversely with density.

This is consistent with the Draft Fingal Development Plan 2011-2017, which states that *"developments located within 1,000m of a Metro Station can operate effectively with less parking provision"*.

I trust that the views of the NTA will be taken into consideration.

Yours Sincerely,



Gerry Murphy
Chief Executive Officer